Qwest Communications International Inc.
WC Docket No. 04-313; CC Docket No. 01-338

Comments
Attachment 1
Declaration of Dennis Pappas
October 4, 2004

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numerous trials with a single CLEC in Idaho, Iowa, Minnesota and Washington. During

this test, the pre-wires were performed on Design/Verify/Assign (DVA) while the lift and

lay activity was conducted beginning at 3:00 AM on the Due Date. In only one instance

was a line in use when the pre-wire or lift and lay process began – and not surprising, it

was the same end user in both cases. Confidential Exhibit DP-12 is the report from

Hitachi Consulting providing additional detail on each of these batches in addition to

detailed time measurements.

56. Qwest's decision to perform the work in these early morning hours was

developed with two things in mind – little to no disruption to the end users service and

working on frames in an efficient manner with little to no traffic on them. We believe

that we accomplished both but met with some discontent from CLECs that wanted to

schedule conversions at specific times. Qwest demonstrated that it can not efficiently

prioritize central office work and organize COTs' movements through the central office if

CLECs are able to demand that certain cutovers be performed at specific times. Such

scheduling would interrupt the efficient task flow and reintroduce the need for the QCCC

to communicate via telephone with CLECs regarding work start and stop times.

Importantly, if a CLEC finds that it needs to schedule a hot cut for a particular customer

at a specific time, the CLEC will still have the ability to do so by using the existing

coordinated hot cut process. As explained above, Qwest provisions over more than 99%

of such coordinated cuts on time today.

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57. While picking times would not lend itself to remaining efficient, choosing days is another story. With the implementation of Appointment Scheduler for batch scheduling, the CLECs will be able to schedule conversions on any normal business day (Monday – Friday) as long as the batch limits in a given CO have not been exceeded. However, the expectation still remains that a transition plan would need to occur between the parties to ensure an orderly conversion schedule. While the CLECs at the first forum generally accepted the need (and the *Triennial Review Order*'s legal requirement) for up-front planning for the transition of the embedded base of UNE-P lines, several CLECs expressed concern with having an up-front coordination step for batched migrations of newly acquired customers and the time frames associated with such a meeting. In response to these comments, Qwest agreed to modify the Appointment Scheduling Tool to enable CLEC to schedule their own batch hot cut days. The tool will allow a CLEC to search for a specific CO and a specific date. The tool will display the number of batch hot cuts that can be performed on that date at the selected CO. If there are slots available, the CLEC may then reserve a number of cuts in that CO for the designated day. If the CLEC enters 25 or more lines for conversion, the Appointment Scheduler functionality will return an appointment confirmation number. In addition, CLECs will be able to "add" lines to an existing batch as long as the standard installation interval is met, and the batch size does not exceed 100 lines.

### C. *Batch Statusing*

Qwest Communications International Inc.
WC Docket No. 04-313; CC Docket No. 01-338

Comments
Attachment 1
Declaration of Dennis Pappas
October 4, 2004

**REDACTED – FOR PUBLIC INSPECTION**

58. This tool will provide BHC status to the CLEC throughout the entire BHCP, not just on the Due Date. The BST will allow each CLEC to review the status of their Batch Hot Cut orders when the orders are processed through the Service Order Processor into the Work Force Administrator ("WFA"). Qwest expects typical orders to appear on the BST approximately 2 days following order submission, and several days before the Due Date. Information provided on the BST will include:

- Due Date

- Customer Identification (ZCID)

- State

- Common Language Location Identifier (CLLI)

- Complete with Related Order (CRO) field

- Circuit Facilities Assignment (CFA) Location

- Circuit Facilities Assignment (CFA) Number

- Job Identifier

- Circuit Layout Order (CLO) number

- Purchase Order Number (PON)

- Order Number

- Telephone Number (TN)

- Order status (Pending, Jeopardy (No Dial Tone, Customer Not Ready, Line in Use, Polarity Reversal), and Completed)

- Completion Date/Time

Qwest Communications International Inc.
WC Docket No. 04-313; CC Docket No. 01-338

Comments
Attachment 1
Declaration of Dennis Pappas
October 4, 2004

**REDACTED – FOR PUBLIC INSPECTION**

- Required Response Date/Time for Completed and Jeopardy orders

- QCCC e-mail address for CLEC messages pertaining to Completed and Jeopardy orders.

59. Qwest will provide the information listed above in a format that allows CLECs to sort the data and to download it into a Microsoft Excel file. An example of the Appointment Scheduler and BST's output is attached in Exhibit DP-13. At the same time, CLECs will continue to receive the same IMA notifications (Firm Order Confirmations ("FOCs"), Service Order Completions ("SOCs"), etc.) for their BHC orders that they currently receive for their requests today. However, IMA completion notifications are not sent until the order is completed within Qwest's service order processor. Qwest created the Batch Status Tool to give CLECs status information faster than they can receive it through IMA.

60. The timely updates into the Batch Status Tool are accomplished by system integration with the Work Force Administration (WFA) which is the same system Qwest CO technicians receive their work assignments from and enter their work completion records into immediately following the lift and lay of the first order in the Batch and then again upon completion of the last order in the Batch (at a minimum, the 25th line). The Batch Status Tool was designed to query WFA for all Batch Hot Cut status changes and will provide updates for the CLEC to review. Once the application queries WFA, the pending, jeopardy and recently completed orders information will immediately post to the

Qwest Communications International Inc.
WC Docket No. 04-313; CC Docket No. 01-338

Comments
Attachment 1
Declaration of Dennis Pappas
October 4, 2004

**REDACTED – FOR PUBLIC INSPECTION**

Batch Status Tool. The Tool will also allow commissions with a means of tracking

CLEC conversion progress if State Commission have a desire to do so.

61. While the Status Tool addressed the CLECs' needs, the CLECs to some extent

seemed to be at odds with each other. MCI reported that it was pleased with the solution,

that a web-based tool would provide CLECs with adequate notice, and that it was not too

much work for CLECs to retrieve information from a web-based status tool. AT&T, by

contrast, took one aspect of the BST to impasse. AT&T argued that a tool that provides

automatic status update information at a web site still required the CLEC to perform too

much work to retrieve that information; instead, AT&T wanted Qwest to "push" the

information to them (via an e-mail, for example) when an order was in jeopardy status,

even though the status tool provides the CLEC with 72 hours to rectify a NDT situation.

This position ran counter to AT&T's original comments. Qwest's original plan was to

send an e-mail, and AT&T (and many other CLECs) objected to e-mail notification and

requested a web-based status tool instead. Once Qwest provided the status tool they had

requested, AT&T reversed course and again demanded e-mail notification. The need for

such notification has been eliminated with the adoption of the status tool.

**D.     _Batch Ordering_**

62. During the ordering of a BHC, CLECs will complete an accurate LSR via

either EDI or IMA GUI in the same manner they do for a Basic Hot Cut request today.

LSRs requesting BHCs must also contain the CHC field populated with a "B" for batch

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and include the confirmation number for the batch and frame due date returned from

Appointment Scheduler.

63. The BHCP also includes additional IMA validations such as determining that

the CLEC has appropriately populated LSR fields designating the order as a BHC. These

validations will take the form of new edits and/or error messages. Business Process

Level ("BPL") edits which will be developed are items to aid the CLEC in making a

BHC request. The CHC field must be populated with the correct elements for the request

to move forward into the batching of the service order for the CO. Some of the fields

which will have the BPL edits established are the REQTYP – request type AB, BB, or

UB, ACT-V (for conversion as specified) or Z (conversion with no directory listing

changes), APTCON (this would be populated with the information from the Appointment

Scheduler), TEST=N or blank (indicating there are no special testing requirements).

DSPTCH=N or blank (indicating no dispatch), CHC=B (indicating the request is for a

BHC), NC=LX- - (for loop) or LX-N (loop with loop splitting) (this is the only network

channel code allowed in the BHCP). Once an LSR passes these validations, a BHC

USOC will be assigned to the Qwest service order. The BHC USOC drives the

utilization of the new BHC process and the corresponding new lower NRC for each line

associated in the BHC. All CLECs agreed that this process was acceptable.

### E.      *Batch Provisioning Intervals*

64. The CLEC must submit an LSR at least seven business days in advance of the

time slot available in the scheduling tool. In past 271 proceedings, CLEC and State

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Commissions agreed to a seven business day interval where the CLEC submits order

volumes between 17-24 lines for the same customer at the same address. These intervals

are memorialized in the Service Interval Guide ("SIG"), which is Exhibit C to the state's

approved SGAT, and which is attached here as Exhibit DP-14. Unlike the current

provisioning options for project types of conversions, the BHC seven business day

interval allows the CLEC to give their end user a date certain due date without the need

to negotiate when volumes are in excess of 24 lines. To my knowledge, this interval is

significantly shorter than those offered by any other ILEC for comparable UNE-P

migration activity.

### F.    *Batch DVA Activity – Pre-Wiring*

65. Qwest had intended to move the pre-wire and DT/ANI steps to the Due Date

for efficiency reasons; however, several CLECs at the forum asked that these steps

remain on DVA (day 2 or 3 in a 7 business day interval) in order to allow time for both

Qwest and the CLEC to respond to any issues that may be encountered with their

respective networks. Qwest agreed to modify its new BHCP to keep these work steps on

days 2 or 3 with the understanding that Qwest will have discretion to perform pre-wiring

and the DT/ANI tests on either day 2 or day 3 in order to gain the efficiencies from

balancing the workload over multiple days. Upon concluding these testing steps, Qwest

will notify the CLEC via the Batch Status Tool of any No-Dial-Tone ("NDT") or reverse

wiring or bad CFA situations. The NDT notification provides the CLECs with ample

time prior to the Due Date to resolve issues. Qwest explained at the forum that moving

Qwest Communications International Inc.  
WC Docket No. 04-313; CC Docket No. 01-338

Comments  
Attachment 1  
Declaration of Dennis Pappas  
October 4, 2004

**REDACTED – FOR PUBLIC INSPECTION**

pre-wiring and testing to days 2 and 3 of the process instead of conducting all the work

on Due Date, which Qwest originally proposed, would increase the costs associated with

the COT activity - the CLECs requested the pre-wiring change anyway.

66. One of the most important steps in the pre-wire process is having dial tone to

verify when the pre-wiring is occurring. To this end, the CLECs committed at the Forum

to have their switch translations completed by midnight of day 1, and agreed that such a

commitment is reasonable.[26] If the CLEC receives a jeopardy via the web-based status

tool, then the CLEC will have a minimum of 2 days and a maximum of 3 days to issue a

subsequent order to change their CFA, perform their translation work or correct any other

CLEC related issue that may be causing the problem. Per the PCAT the standard interval

for CFA changes is 3 days, therefore the CLEC's subsequent LSR for CFA changes

needs to be submitted no later than 7 PM on day 4 of the 7 day interval. For all CLEC

changes, other than CFA changes, the CLECs do not need to notify Qwest of their

corrective actions. Qwest will assume that corrective action will be taken by DD. It

remains the responsibility of the CLEC to ensure that its network (collocation facilities

and tie cable pairs between that collocation and its terminations on the ICDF) are

working and able to carry dial tone between these points. The verification by the CLECs

can occur any time between when the collocation is first established up until the day the

conversion orders are due; it is up to the CLEC to make this determination. The CLEC

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[26]     *See, e.g.*, 1/17/04 Tr. at 173:1-13, 22-24 (John Finnegan, AT&T) (noting that AT&T's normal business procedure is to establish switch translations prior to submitting the LSR or mechanically within four hours of receipt of the FOC; hence it "would not be a problem" to have switch translations in place by midnight of day one.

Qwest Communications International Inc.                                                  Comments
WC Docket No. 04-313; CC Docket No. 01-338                    Attachment 1
Declaration of Dennis Pappas
October 4, 2004

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does not have to (and should not) wait until it receives a NDT notice from Qwest to resolve issues on its side of the network. The CLEC could do this testing by placing testing equipment at its switching location and the same type of equipment on the vertical side of the ICDF to measure end-to-end continuity. Upon conclusion of a successful pre-wire, the CLEC's dial tone should be appearing on a jumper that has been run, via the aforementioned frames, to the COSMIC™ or Main Distribution Frame ("MDF") and looped near its final termination point for the lift and lay activity on the order's due date.

### G. *Due Date Activity – Lift and Lay*

67. On due date, the Qwest COT will test the pre-wired loop, at the COSMIC™ or MDF, for dial tone to ensure that the CLEC has worked their translations and that the CLEC CFA information is correct and working. In addition, Qwest will conduct an ANI test on the Qwest cable and pair (where the existing UNE-P customer resides) to ensure that the correct pair and TN are reflected on the service order. Upon verifying both the CLEC and existing customers' DT, Qwest will monitor the line prior to performing the lift and lay and conduct the work only after finding the line in an idle state. If idle, the lift and lay will remove the end user from the Qwest switching platform and connect them to the CLEC's switching platform. Qwest performs a final DT/ANI test at the protector frame once all of the office wiring is complete to verify that the lift and lay was performed correctly and DT is present at the last point before it leaves the CO. However, if the line is in use, the Qwest COT would recheck the line at a later time (total of three times) and if still in use, remove the line (and any other associated line on the same order)

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from the batch. At this point, the CLEC would be notified via the Batch Status Tool of

the line being in use and Qwest's placement of this order in jeopardy status. At this

point, it is up to the CLEC to reschedule a new due date for this customer and their lines.

The possibility of this occurring is significantly reduced by the time frame in which these

cuts are performed – 3:00 a.m. to 11:00 a.m. The CLEC should also take this opportunity

to notify their end users of the pending order activity and let them know that they may

experience a momentary disruption during the hours of operation that Qwest will convert

an embedded base UNE-P order utilizing the BHCP.

68. If dial tone is not present on the due date, the CLEC will be notified and the

LSR will be placed in jeopardy status and removed from the batch. It is important to note

that if a single LSR contains multiple loops and a single loop does not have dial tone on

the Due Date, then all loops in the LSR are placed in a jeopardy status. This is necessary,

and the CLECs at the Forum did not object to this point. Upon notification, the CLEC

will need to issue a subsequent change to that order and resubmit the LSR for a new Due

Date. At the CLEC's option, the LSR can be added to another batch for that office or a

different installation option can be chosen. Additionally, the CLEC needs to verify if the

LSR was related to any other LSRs. It is the CLECs responsibility to notify Qwest if

there are any related LSRs that need to be cut back.

### *H.     Batch and the Cut Back Process*

69. The cut back process is the same as the one currently used by the CLECs

today with any of the other provisioning options or products. Exhibit DP-15 sets forth

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the cut back process. In essence, this process allows the CLEC to notify Qwest the day

of the conversion and request that the CLEC end user be moved back to the Qwest

switching platform due to some issue that the CLEC was not able to resolve and was

concerned about their end user's ability to receive phone calls or retain DT. Upon

receiving notification from the CLEC, the QCCC would notify the CO requesting that the

COT move the CLEC end user back to the facilities that they resided on prior to the

conversion order being worked. In order to ensure that the cut back can occur without

the need to submit a new service request, the CLEC must notify Qwest of the need to cut

back end user line within two hours of work completion identified through the Batch

Status Tool. The CLEC will email the QCCC with the cut back information. If this

request is submitted to Qwest after the 2 hour work completion notification, the CLEC

would have to issue a new service request for the service to be reconnected. One of the

additional benefits of conducting the BHC work during the early morning hours is that it

gives the CLEC ample opportunity to determine if issues exist long before Qwest's

translations removal would complete. The frame due time will continue to be 6:00 PM

for all conversion orders. The parties agreed that this process was acceptable.


*I.*        *Batch and Number Porting*

70. One of the most important aspects of any conversion is the notification to the

switch staff and the subsequent submittal of the subscription in order to port the number –

this step is beyond the control of Qwest and the BHCP. The CLECs have two ways to

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know when the central office work has been completed. First, a CLEC can use existing

functionality in its switches to "Trap and Trace" Qwest's ANI tests on the lines in the

batch, thereby receiving instantaneous notification that the cutover of a line is about to

begin and when the cutover is complete. Second, Qwest has agreed to implement the

Batch Status Tool that will give the CLEC information on order status or status changes

and indicate which orders or batches of orders have been completed.

71. Trap and Trace technology is a switch based feature and appears to be a viable

option which could provide the CLEC with instant notification that the lift and lay

activity has been completed by Qwest. The most common application of this technology

is the Last Call Identification feature, "*69". The CLEC can have its switch "Trap and

Trace" a line that is a candidate for a conversion. By implementing "Trap and Trace",

the CLEC will be able to detect the two ANI tests that the Qwest COT performs

immediately before and immediately after the lift and lay. The initial ANI test would be

an indication that the hot cut of that line is beginning, and the post-cutover test would

signal that the lift and lay of that line had been completed. By monitoring its switch, the

CLEC's OSS can effectively receive instantaneous notification when a cut-over is

finished and electronically initiate the porting of the telephone number associated with

that line, thereby keeping customer outage times to a minimum.

72. This notification solution was discussed late in the BHC Forum and tested by

a CLEC as part of the BHC process testing that was conducted. Other CLECs agreed to

continue researching it after the Forum's conclusion and to report back to Qwest prior to

Qwest Communications International Inc.
WC Docket No. 04-313; CC Docket No. 01-338

Comments
Attachment 1
Declaration of Dennis Pappas
October 4, 2004

**REDACTED – FOR PUBLIC INSPECTION**

the filing of testimony. On January 21, 2004, AT&T representative John Finnegan

reported by e-mail that AT&T was still considering trap and trace but "believe[s] it had

some potential to work," although AT&T believes it should not be the only notification

method available to CLECs.[27] Similarly, a McLeod representative reported by e-mail

that McLeod "believes this could be a viable option," although, like AT&T, McLeod

believes that additional options should be available as well.[28] Trap and Trace was not the

only possible solution suggested at the Forum. Qwest's original proposal involved

notifying the CLECs by e-mail periodically throughout the course of the lift and lay

process to let them know what conversions had been completed. A number of CLECs

expressed concern with an e-mail-based notification process citing latency in their

network and having to designate a single e-mail address that will receive such e-mails.

Therefore, as previously mentioned, Qwest is developing the Batch Status Tool.

### J.    *Batch Performance*

73. Qwest will continue to monitor the BHCP in the same manner that loop

conversion activity is monitored today. There are currently PIDs in place that monitor

loop installations and Qwest believes that certain aspects of these existing measurements

should/will be applicable to the BHCP. In addition, personnel from the QCCC will

continue to monitor order misses and conduct analysis to determine reason for miss and

address each through further training or modifications to the existing process. Qwest will

also take steps to ensure that the dedicated teams of COTs assigned to this effort will

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[27]    E-mail from John F. Finnegan, AT&T, to Carolyn Hammack, Qwest (Jan. 21, 2004).
[28]    E-mail from Patty C. Lynott, McLeod to Carolyn Hammack, Qwest (Jan. 21, 2004).

Qwest Communications International Inc.
WC Docket No. 04-313; CC Docket No. 01-338

Comments
Attachment 1
Declaration of Dennis Pappas
October 4, 2004

**REDACTED – FOR PUBLIC INSPECTION**

receive and acknowledge proper training on the new process prior to the first BHC being

performed. This training will also be conducted within those organizations whose

processes are impacted by the changes this joint team has made under the new process.

74. As part of the Section 271 process, Qwest, the CLEC community and the 14-

state commissions created a process known as Long Term PID Administration ("LTPA").

The purpose of the LTPA is to create new performance measures or PIDs or to modify

existing PIDs as the requirements of the business dictate. Qwest has agreed to expedite

the creation of batch hot cut specific PIDs if such PIDs are deemed necessary by the

LTPA. If the LTPA decides that creation of the BHCP does not require changes to

existing PIDs or creation of new PIDs, there are many existing PIDs that track Qwest's

performance in providing unbundled analog loops to CLECs. As such, analog loops

provisioned using the BHCP would be included with the many other provisioning options

and would be tracked, from a PID perspective, in some of the following PIDS:

- OP-3: Provisioning Commitments Met on Due Date

- OP-5: New Installation Service Quality (troubles reported within
  30-days of installation)

- All Maintenance and Repair measures including, but not limited
  to, the overall trouble rate (MR-8).

75. Thus, several key components of Qwest's performance will be tracked under

the existing PIDs so that the Commission can monitor Qwest's overall performance in

provisioning analog loops to CLECs.

## X.     THE HITACHI REPORT

Qwest Communications International Inc.
WC Docket No. 04-313; CC Docket No. 01-338

Comments
Attachment 1
Declaration of Dennis Pappas
October 4, 2004

**REDACTED – FOR PUBLIC INSPECTION**

76. To ensure efficiency, seamlessness and scalability of the new process, Qwest requested assistance from Hitachi Consulting Group in an effort to differentiate between the current Hot Cut process and the newly proposed BHCP and then to make fact based assessments. Hitachi worked with Qwest to verify and validate each step in the new BHCP. Up until the issuance of the Hitachi report, they had participated in each and every trial that Qwest conducted with a CLEC in MN, WA, ID, and IA. Hitachi delves into this in much greater detail in its report – Exhibit DP-12 - but I will provide a high level summary. On numerous occasions, Qwest worked with a CLEC to conduct a test utilizing the BHCP. The first test took place in Minneapolis, MN on December 17th and 18th, 2003 and entailed the conversion of two separate batches of orders on consecutive days utilizing Qwest's original proposed BHCP. As such, pre-wire and lift and lay were both conducted on Due Date and communication was limited to electronic spreadsheets between the companies. The second test was discussed earlier in my testimony and took into consideration some of the changes suggested by the CLECs in attendance during the BHC Forum – principally changing the time for pre-wire from Due Date to DVA. The results of the second test were far superior in terms of provisioning time than the results of the first test. This is probably explained by the fact that, in the second test, the COTs were able to conduct their work with limited interference from outside observers – both Qwest and CLEC. Hitachi Consulting was present at each office where the testing was conducted including central offices in CO, WA, ID, IA and MN to monitor the tasks associated with each of the swim lanes on the process flow. The information witnessed

Qwest Communications International Inc.
WC Docket No. 04-313; CC Docket No. 01-338

Comments
Attachment 1
Declaration of Dennis Pappas
October 4, 2004

**REDACTED – FOR PUBLIC INSPECTION**

during these observations served as the basis for the assessments Hitachi was performing

to ensure that the newly proposed BHCP can meet the needs of the CLEC community not

only in those markets where a finding of no impairment is entered, but also where CLECs

desire to use the new process for its newly acquired customers. The Hitachi work was

not limited to the central office either. Hitachi also conducted observation in many of

Qwest work centers including the QCCC, Design Services Center, Service Delivery,

Loop Provisioning Center, ("LPC") and Central Office Resource Allocation Center

("CORAC") with the expectation of observing conversions both under the current Hot

Cut process as well as the new BHCP.

77. The results of these observations are contained in Hitachi's report but, in

summary, here is what it concluded. Based on the current volumes being processed

through the QCCC, and Hitachi's observations in the field, Hitachi assessed Qwest's

capabilities of being able to handle any anticipated increase in volumes of unbundled

loops that may occur as a result of elimination of unbundled switching as a UNE.

Hitachi's conclusion was that the proposed changes in the process and the systems would

allow Qwest to handle the volumes expected. Qwest conducted additional BHCP testing

in WA and ID following the release of the Hitachi report, and, while the location and

COT experience levels differed, the results were fairly consistent with those observed and

documented in the earlier trials.

Qwest Communications International Inc.
WC Docket No. 04-313; CC Docket No. 01-338

Comments
Attachment 1
Declaration of Dennis Pappas
October 4, 2004

**REDACTED – FOR PUBLIC INSPECTION**

## XI.    QPP IMPROVEMENTS

78.    In addition to the robust BHCP that was developed through the batch hot

cut forum, Qwest has agreed to other improvements as part of its QPP commercial

arrangement with MCI.  As described in Mr. Campbell's Declaration, several other

CLECs have signed the QPP agreement as well.

79.    Any carrier signing a batch hot cut amendment to its ICA receives the

following BHC improvements:

- Loops provisioned over IDLC systems can be grouped together by
  the CLEC in batches not exceeding 40 per day per state, subject to
  an IDLC premium, in addition to the normal BHC non-recurring
  charge.  The 40 per state are in addition to the 100 per day per
  central office that Qwest had already committed to migrate during
  the joint forum sessions.

- The migration of line splitting loops to loop splitting in those
  instances where the data provider, splitter equipment and
  terminations remain the same.  These migrations will count toward
  the BHC central office limits noted in earlier testimony.

80.    Any carrier signing the QPP agreement receives the following additional

improvements:

- Substantial reductions in batch hot cut rates in most states.[29]

- IDLC batches subject to a lower IDLC premium applied to each
  and every loop migrated under the BHCP.

- The migration of line splitting loops to loop splitting in those
  instances where the data provider, splitter equipment and
  terminations remain the same.  These migrations will count toward
  the BHC central office limits noted in earlier testimony.

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[29] See Campbell Declaration ¶ 12.

Qwest Communications International Inc.                            Comments
WC Docket No. 04-313; CC Docket No. 01-338          Attachment 1
Declaration of Dennis Pappas
October 4, 2004

## XII.   CONCLUSION

81.     The joint discussions and eventual introduction of the Qwest BHCP address each and every concern contemplated by the FCC in their *Triennial Review Order*. Qwest developed the BHCP jointly with a wide variety of CLECs during the BHC Forum and while those sessions concluded with some outstanding issues, the framework of the BHCP was established – it has been tested in a commercial environment and has met the expected central office demand at the daily maximum volumes. The OSS modifications being made to supplement the BHCP will only add to the efficiencies and will result in a more mechanized process for order scheduling and notification. Finally, CLECs signing the BHC amendment and/or QPP commercial agreement enjoy additional improvements to the BHCP. This process should eliminate any concern that the need for batch hot cuts represents impairs CLECs from entering a market in the absence of unbundled mass market switching.

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Exhibits List for Batch Hot Cut Testimony

I hereby certify, under penalty of perjury, that the foregoing is true to the best of my knowledge, information, and belief.

Executed on _October 1_, 2004

Dennis Pappas

# EXHIBIT DP-1

# EXHIBIT DP-2

The Hot Cut Process allows telecommunications customers to be converted from one provider to another. The actual hot cut is performed when a customer is not using the circuit and therefore, will not noticeably impact their service. To complete this conversion, it requires that the customer's line be physically switched from the original provider's circuit to the new provider's circuit. The conversion, performed by a technician within the central office, is referred to as a "Hot Cut."

Currently this process is performed one order at a time.

A proposed new process referred to as the Batch Hot Cut Process will allow the work steps for multiple orders to be handled concurrently by two technicians working in tandem.

The following video will demonstrate both the current hot cut process and the proposed Batch Hot Cut Process and will not only follow the various tasks performed while making a hot cut, but will also demonstrate that the batch hot cut process is faster and more efficient than current procedures.

The "Hot Cut" consists of four basic parts: Receiving the Service Order, circuit pre-wiring and testing, the actual Hot Cut and re-testing, and lastly the updating of software and records to reflect the transfer.

The proposed Batch Hot Cut Process will provide additional efficiency by allowing C-LECs to submit multiple loop service orders which Qwest will combine on a single spread sheet for internal use to assist the central office technicians to prioritize by the cross connection location on the InterConnection Distribution Frame and COSMIC or Main Distribution Frame, per C-LEC so that the technicians can perform multiple functionality in each working location more efficiently.

Phone calls traverse a Central Office a facility where subscribers' telephone lines are joined to switching equipment for the connection of local and long distance calls.

Within the Central Office are distribution frames, which are termination points for wiring on one side of the protector frame connecting thousands of wires from the outside world; on the other side are the wires coming from the Central Office switch itself. Both sides are connected with a "jumper" wire that completes the circuit which is the physical connection or path between two given points through which an electric current may be established, and is required for a customer to receive telephone service.

To change switch service providers, one end of the jumper wire is moved from its current location to a new location, called a "hot cut."

The existing circuit from the central office to the end user will remain the same with a hot cut however the portion of the circuit within the central office connecting the switch to the outside world must be transferred from the Qwest Switch to the C-LEC Switch.

Using information provided to Qwest by the C-LEC, Qwest prepares a service order that includes detailed circuit information, including block location and the telephone number, from which the technicians are able to locate and prepare the circuit for the transfer.

To create the new C-LEC portion of the circuit, technicians begin at the C-LEC's Interconnect Distributing Frame or ICDF, the ICDF is the location in the central office where the C-LEC interconnects into the Qwest Network.

A jumper wire is connected from the connecting block on which the C-LEC's service is terminated to a connecting block that terminates to an existing tie cable that runs between the ICDF and the MDF.

The tie pair cables terminating connector block location on the COSMIC Frame is then wired to a jumper that will terminates on the end user's existing cable pair when the Hot Cut is performed.

When the hot cut is completed the dial tone will then be provided by the C-LEC.

Let's look at a simple overview of how the actual hot cut is performed today.

First the technicians check the CLEC's Connecting Facility Assignment located on their ICDF block and terminal location for dial tone.

If dial tone is not present this is noted and properly reported and wiring continues.

The wiring consists of first running a jumper wire from the block and terminal location on the ICDF is run to an open tie cable pair. In the current process the technician wires only a single circuit at this stage.

After completing work at the ICDF, the technician moves to the COSMIC Frame, where the network is connected to the end user and where the actual hot cut will be performed.

At the COSMIC Frame the technician attaches a jumper wire from the connecting block on which the tie cable from the ICDF is terminate

which runs to the appropriate plant cable termination block going to the outside world.

The jumper wire is then tied in a knot or kinked and left unconnected so that it may be easily identified at the time of the hot cut.

Continuity and Automatic Number Identification known as ANI testing of the Qwest customer line are now performed. Any problems detected are reported. Preparatory work is now complete.

Prior to the actual hot cut being performed, a second ANI test is conducted verifying the telephone number on the circuit and the line is monitored to ensure that the CLEC's end user is not currently utilizing the line. If the line is idle, COT will perform the hot cut or lift and lay process which removes the Qwest service to the customer as shown and replaces the jumper wire with the jumper ran during the pre-wire step as identified earlier in the process. In this step the technician is shown running a jumper from (ICDF) Interconnection Distribution Frame to the Cosmic or Main Distribution Frame or MDF.

The technician then moves to the facility protection Heat Coil blocks which acts like a fuse box, protecting the central office equipment from outside power surges.

The Heat Coil block is where final dial tone and ANI testing of the C-LEC service occurs.

Any problems encountered at the protectors will be isolated to the central office wiring and corrected immediately or properly reported and the technician will complete on their WFADI terminal the customer circuit work requests.

After completing the physical work the technician will update Qwest records to indicate that actual connectivity of the circuit serving the end user is no longer served with Qwest dial tone. (End of Current Process)

Now that we have reviewed the Hot Cut Process, let's take a look at the proposed Batch Hot Cut Process which would allow two technicians to wire multiple circuits for the entire end user batch at the ICDF rather than performing only one order at a time, significantly increasing efficiency.

Because current process only allows a technician to wire one circuit at a time, multiple trips must be made by the technicians between the ICDF and the